

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Lindsay Cooper (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS LETTER BRIEF  
OPPOSING DEFENDANTS' REQUEST  
TO FILE A SUR-REPLY IN SUPPORT OF  
WAYMO'S MOTION TO COMPEL**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
7 Seal its May 17, 2017 Letter Brief opposing Defendants’ Request to File a Sur-Reply in Opposition to  
8 Waymo’s Motion to Compel and Exhibit 1 thereto (the “Administrative Motion”). The  
9 Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Letter Brief	Highlighted in Blue	Defendants
Exhibit 1 to Letter Brief	Highlighted in Blue	Defendants

10  
11  
12  
13 3. The Letter Brief and Exhibit 1 thereto contain references to information that Waymo  
14 believes is considered confidential or non-public by one or more Defendants

15 4. Waymo takes no position as to the merits of sealing any of Defendants’ designated  
16 material, and expects Defendants to file one or more declarations in accordance with the Local Rules.

17  
18 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
19 true and correct, and that this declaration was executed in San Francisco, California, on May 17, 2017.

20 By /s/ Lindsay Cooper

Lindsay Cooper  
Attorneys for WAYMO LLC

21  
22  
23 **SIGNATURE ATTESTATION**

24 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
25 filing of this document has been obtained from Lindsay Cooper.

26  
27 /s/ Charles K. Verhoeven  
Charles K. Verhoeven